

EMARD, DANOFF PORT TAMULSKI & WALOVICH LLP

Andrew I. Port (State Bar # 120977)

James J. Tamulski (State Bar # 64880)

Kevin M. Baldwin (State Bar # 287580)

49 Stevenson Street, Suite 400

San Francisco, California 94105

T: (415) 227-9455

F: (415) 227-4255

aport@edptlaw.com

jtamulski@edptlaw.com

kbaldwin@edptlaw.com

Attorneys for Defendants

KAWASAKI KISEN KAISHA, LTD. and

SAL HEAVY LIFT, GmbH, (erroneously sued

herein as “Sal Group” and/or “Sal Germany”)

THE TURLEY LAW FIRM, APLC

William Turley (State Bar # 122408)

David Mara (State Bar # 230498)

625 Broadway, Suite 635

San Diego, CA 92101

T: (619) 234-2833

F: (619) 234-4048

dmara@turleylawfirm.com

Attorneys for Plaintiffs

JOHN GONZALES and MARIBEL GONZALES

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JOHN GONZALES and MARIBEL
GONZALES,

Plaintiffs,

vs.

KAWASAKI KISEN KAISHA, LTD.; M/V
FRAUKE; SAL GROUP; SAL GERMANY;
and DOES 1 to 100.

Defendants.

Case No.: 4:13-CV-04758 NC

IN ADMIRALTY

**STIPULATION AND ORDER TO
CONTINUE DISCOVERY DEADLINE
AS MODIFIED**

1 Subject to the approval of this court, the parties hereby stipulate to the following order to
2 continue the pretrial deadlines and trial date for 60 days from the original dates set by the
3 January 16, 2014 Case Management Scheduling Order. Pursuant to and for the reasons set forth
4 in the Declaration of the Parties submitted herewith, the parties hereby request the following
5 order be entered in this action:

6 1. The discovery cut-off date originally scheduled for August 15, 2014 is continued
7 until October 14, 2014.

8 2. Disclosure of expert witnesses originally scheduled for September 15, 2014, is
9 continued until November 14, 2014.

10 3. Completion of expert witness discovery, originally scheduled for November 15,
11 2014, is continued until December 13, ~~2015~~ ²⁰¹⁴.

12 4. The last day to complete mediation of this matter, currently schedule for August
13 1, 2014, is continued until October 1, 2014.

14 5. A Further Case Management Conference originally scheduled for August 20,
15 2014, is continued until October 22, 2014, or such later date as is required by the Court's
16 calendar.

17 6. The deadline for filing and serving Dispositive Motions, originally scheduled for
18 September 5, 2014, is continued until November 4, 2014.

19 7. The deadline for the parties to meet and confer and file Pretrial Statements,
20 originally scheduled to be filed by January 21, 2015, is continued until March 20, 2015.

21 8. The Pretrial Conference, originally scheduled for February 4, 2015, is continued
22 until April 8, ~~2014~~ ²⁰¹⁵, or such later date as is required by the Court's calendar.

23 9. The Trial of this matter, originally scheduled for February 23, 2015, is continued
24 until April 27, or such later date as is required by the Court's calendar.

1 IT IS SO STIPULATED.

2
3
4 Dated: June 18, 2014

EMARD DANOFF PORT TAMULSKI
& WALOVICH LLP

5
6
7 By: /s/ ANDREW I. PORT
ANDREW I. PORT
Attorneys for Defendants
8 KAWASAKI KISEN KAISHA, LTD and SAL
9 HEAVY LIFT, GMBH, (erroneously sued herein as
"Sal Group" and/or "Sal Germany")

10 Dated: June 18, 2014

THE TURLEY LAW FIRM

11
12 By: /s/ DAVID MARA
DAVID MARA
Attorneys for Plaintiffs
13 JOHN GONZALES and MARIBEL GONZALES
14

15
16 CERTIFICATE OF SIGNATURE

17 I attest that the content of this document is acceptable to all persons above, who were
18 required to sign it.

19 /s/ ANDREW I. PORT
ANDREW I. PORT
20
21
22
23
24
25
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 19, 2014

